

APPENDIX A

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Neal Mohan ²	11/20/2019	4/27/2023	12/10/2019
Giulio Minguzzi	7/9/2021	5/3/2023	7/12/2021
Tim Lipus	7/9/2021	2/23/2023	7/12/2021
Ali Nouri	6/12/2023* ³	6/14/2023	6/14/2023
Karen Sauder	6/2/2023*	3/8/2021	3/8/2021
Kristen O'Hara	6/2/2023*	6/12/2023	6/12/2023
Scott Sheffer	11/20/2019	2/3/2021	12/10/2019
David Besbris	11/20/2019	1/22/2021	12/10/2019
Hal Varian	11/20/2019	1/22/2021	12/10/2019
Joan Braddi	11/20/2019	1/22/2021	12/10/2019
Kirk Perry	11/20/2019	1/22/2021	12/20/2019
Robert Kyncl	11/20/2019	1/22/2021	12/10/2019

¹ These dates, except as described in footnote 3 below, are taken from the column titled “Custodian Proposed or Added” in Appendix A to Plaintiffs’ Motion for an Adverse Inference.

² Custodians highlighted in green have been designated as trial witnesses by either Plaintiffs and/or Google.

³ Footnote 1 of Plaintiffs’ Appendix A states that Plaintiffs listed the date of the Complaint, January 24, 2023, for all “custodians agreed upon *after* initiation of this litigation.” (Emphasis added.) These custodians had not been agreed upon when the Complaint was filed; they were all agreed to throughout discovery. To calculate the “litigation hold delay” listed in their Appendix A for these custodians, Plaintiffs did not use the actual date when the custodian was proposed or added; instead, they used the date the Complaint was filed. Google has denoted custodians for which Plaintiffs listed the date that the Complaint was filed with an asterisk and instead provided the date, as reflected in correspondence between Google and Plaintiffs, on which the custodians were agreed upon.

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Jerry Dischler	11/20/2019	1/22/2021	12/10/2019
Adam Juda	2/20/2020	1/22/2021	3/5/2020
Ali Miller	2/20/2020	1/22/2021	3/5/2020
Allan Thygesen	2/20/2020	1/22/2021	12/10/2019
Anthony Chavez	2/20/2020	1/22/2021	3/5/2020
Bashar Kachachi	2/20/2020	1/22/2021	3/5/2020
Bethanie Baynes	2/20/2020	1/22/2021	3/5/2020
Bonnie Pericolosi	2/20/2020	1/22/2021	12/10/2019
Chris Gklaros-Stavropoulos	2/20/2020	1/22/2021	3/5/2020
Chris Maxcy	2/20/2020	1/22/2021	3/5/2020
Danielle Romain	2/20/2020	1/22/2021	3/5/2020
Debbie Weinstein	2/20/2020	1/22/2021	3/5/2020
Deepti Bahtnagar	2/20/2020	1/22/2021	3/5/2020
Chris LaSala	2/20/2020	1/22/2021	10/4/2019
Jennifer Koester	2/20/2020	1/22/2021	10/4/2019
Jyoti Vaidee	2/20/2020	1/22/2021	3/5/2020
Karen Aviram Beatty	2/20/2020	1/22/2021	3/5/2020
Kristin Wiechmann	2/20/2020	1/22/2021	1/30/2020
Mary Ellen Coe	2/20/2020	1/22/2021	12/10/2019
Matthew Conroy	2/20/2020	1/22/2021	12/10/2019
Dan Taylor	2/20/2020	1/22/2021	10/4/2019
Rudy Galfi	2/20/2020	1/22/2021	12/10/2019
Tript Singh Lamba	2/20/2020	1/22/2021	3/5/2020

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Vidhya Srinivasan	2/20/2020	1/22/2021	12/10/2019
Vishal Sharma	2/20/2020	1/22/2021	7/13/2020
Duke Dukellis	2/20/2020	1/22/2021	12/10/2019
Jason Spero	2/20/2020	1/22/2021	3/5/2020
Payam Shodjai	2/20/2020	1/22/2021	12/10/2019
Igor Perisic	6/13/2023*	10/16/2023	10/16/2023
Sue Lai	6/13/2023*	9/25/2023	9/25/2023
Eu-Jin Goh	7/21/2023*	7/26/2023	7/26/2023
Jon Newmuis	7/21/2023*	7/26/2023	7/26/2023
Stuart May	7/21/2023*	7/26/2023	7/26/2023
Thomas Pan	7/21/2023*	7/26/2023	7/26/2023
Alok Verma	8/3/2020	1/22/2021	12/10/2019
Aparna Pappu	8/3/2020	1/22/2021	10/4/2019
Bryan Rowley	8/3/2020	1/22/2021	3/5/2020
David Goodman	8/3/2020	1/22/2021	6/23/2020
Drew Bradstock	8/3/2020	1/22/2021	12/10/2019
Gargi Sur	8/3/2020	1/22/2021	1/30/2020
George Levitte	8/3/2020	1/22/2021	6/23/2020
Haskell Garon	8/3/2020	1/22/2021	1/30/2020
Jasper Seldin	8/3/2020	1/22/2021	6/23/2020
Jerome Grateau	8/3/2020	1/22/2021	1/30/2020
Lisa Lehman	8/3/2020	1/22/2021	8/6/2020
Madhu Vudali	8/3/2020	1/22/2021	7/14/2020

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Rany Ng	8/3/2020	1/22/2021	6/23/2020
Tobias Maurer	8/3/2020	1/22/2021	6/23/2020
Vip Andleigh	8/3/2020	1/22/2021	8/6/2020
Jim Giles	8/3/2020	1/22/2021	6/23/2020
Max Loubser	8/3/2020	1/22/2021	6/23/2020
Scott Spencer	8/3/2020	1/22/2021	12/10/2019
Woojin Kim	8/3/2020	1/22/2021	6/23/2020
Christopher Tignor	6/12/2023*	6/14/2023	6/14/2023
Christophe Combette	6/2/2023*	6/12/2023	6/12/2023
Darline Jean	6/2/2023*	6/12/2023	6/12/2023
Kai Umezawa	6/2/2023*	6/12/2023	6/12/2023
Nicky Rettke	6/2/2023*	6/12/2023	4/28/2021
Selin Song	6/2/2023*	6/12/2023	6/12/2023
Shashi Upadhyay	6/2/2023*	6/12/2023	6/12/2023
Sneha Thomas	6/2/2023*	6/12/2023	6/12/2023
Ajay Bangla	5/18/2023*	5/25/2023	5/25/2023
Anthony Altimari	5/5/2023*	5/25/2023	5/25/2023
Casper Verhoofstad	5/18/2023*	5/25/2023	5/25/2023
Courtney Rose	5/5/2023*	5/25/2023	5/25/2023
Erin Corkins	5/24/2023*	5/25/2023	5/25/2023
Katie Dodson	5/24/2023*	5/25/2023	5/25/2023
Meghan Zidar	5/5/2023*	5/25/2023	5/25/2023
Mike Westervelt	5/24/2023*	5/25/2023	5/25/2023

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Nathalie Sajous	5/10/2023*	5/25/2023	11/19/2020
Rahul Kooverjee	5/18/2023*	5/25/2023	5/25/2023
Samantha Franklin	5/24/2023*	5/25/2023	5/25/2023
Sarah Rock	5/5/2023*	5/25/2023	5/25/2023
Simon Bolger	5/10/2023*	5/25/2023	5/25/2023
Rita Ren	5/18/2023*	5/23/2023	5/23/2023
Steven Shin	5/18/2023*	5/23/2023	5/23/2023
Alyssa Raiola	5/24/2023*	4/3/2023	4/3/2023
K. Marco Hardie	5/5/2023*	4/3/2023	4/3/2023
Joanna Zimelis Goldblatt	5/5/2023*	4/3/2023	4/3/2023
Sarah Stefaniu	5/24/2023*	4/3/2023	4/3/2023
Sean Harrison	5/5/2023*	4/3/2023	4/3/2023
Sagnik Nandy	1/15/2021	3/8/2021	3/8/2021
Glenn Thrope	1/15/2021	2/23/2021	2/3/2021
Jessica Mok	4/11/2023*	2/23/2023	4/28/2021
Ali Nasiri Amini	1/15/2021	2/3/2021	6/23/2020
Amin Charaniya	1/15/2021	2/3/2021	2/3/2021
Arthur (Art) Price	1/15/2021	2/3/2021	2/3/2021
Elissa Murphy	1/15/2021	2/3/2021	2/3/2021
Eve Goldman	1/15/2021	2/3/2021	2/3/2021
Jason Miller	1/15/2021	2/3/2021	2/3/2021
Jeff Birnbaum	1/15/2021	2/3/2021	2/3/2021
John Tobler	1/15/2021	2/3/2021	2/3/2021

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Julie Chen	1/15/2021	2/3/2021	2/3/2021
Kate Alessi	1/15/2021	2/3/2021	2/3/2021
Kristen Gil	1/15/2021	2/3/2021	2/3/2021
Luis Vilela	1/15/2021	2/3/2021	2/3/2021
Marcel Crasmaru	1/15/2021	2/3/2021	2/3/2021
Martin Kon	1/15/2021	2/3/2021	2/3/2021
Sergio Abreu	1/15/2021	2/3/2021	2/3/2021
Vinay Rao	1/15/2021	2/3/2021	2/3/2021
Erin Schaefer	1/15/2021	1/29/2021	1/29/2021
Alex Shellhammer	1/14/2021	1/22/2021	1/30/2020
Barbara Piermont	1/14/2021	1/22/2021	1/30/2020
Marshall Vale	1/14/2021	1/22/2021	12/10/2019
Susan Childs	1/14/2021	1/22/2021	1/30/2020
Chetna Bindra	1/15/2021	1/22/2021	12/10/2019
David Mitby	1/15/2021	1/22/2021	6/23/2020
Malte Ubl	1/15/2021	1/22/2021	10/4/2019
Roshan Khan	1/15/2021	1/22/2021	12/10/2019
Sam Temes	1/15/2021	1/22/2021	1/30/2020
Vivek Rao	1/15/2021	1/22/2021	6/23/2020
Nirmal Jayaram	1/15/2021	1/22/2021	6/23/2020
Vlad Sinaniyev	1/15/2021	1/22/2021	9/17/2020
Rob Hazan	8/3/2020	8/6/2020	8/6/2020
Kishore Kanakamedala	2/20/2020	2/21/2020	3/5/2020

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Gabe Kronstadt	2/16/2021	2/10/2021	2/10/2021
Medha Vedaprakash	5/10/2023*	1/18/2023	1/18/2023
Paul Muret	2/16/2021	1/22/2021	1/30/2020
Sean Downey	2/16/2021	1/22/2021	12/10/2019
Eisar Lipkovitz	8/3/2020	6/22/2020	6/22/2020
Josh Cohen	8/3/2020	6/22/2020	6/22/2020
Bonita Stewart	11/20/2019	10/4/2019	10/4/2019
Brad Bender	11/20/2019	10/4/2019	10/4/2019
Donald Harrison	11/20/2019	10/4/2019	10/4/2019
Pooja Kapoor	11/20/2019	10/4/2019	10/4/2019
Philipp Schindler	11/20/2019	10/4/2019	10/4/2019
Prabhakar Raghavan	11/20/2019	10/4/2019	10/4/2019
Sundar Pichai	11/20/2019	10/4/2019	10/4/2019
Susan Wojcicki	11/20/2019	10/4/2019	10/4/2019
Sissie Hsiao	11/20/2019	10/4/2019	10/4/2019
Glenn Berntson	5/10/2023*	9/20/2022	9/20/2022
Peentoo Patel	6/2/2023*	9/20/2022	9/20/2022
Tim Craycroft	4/11/2023*	9/20/2022	9/20/2022
Jason Washing	7/9/2021	1/22/2021	10/4/2019
Nikesh Arora	8/3/2020	12/5/2019	12/5/2019
Suresh Kumar	2/16/2021	6/2/2020	6/2/2020
Jonathan Bellack	8/3/2020	10/4/2019	10/4/2019
Sam Cox	8/3/2020	10/4/2019	10/4/2019

Custodian Name	Date Proposed or Added As a Custodian According to Plaintiffs¹	Legal Hold Date Provided in November 8, 2023 Letter	Earliest Date that a Legal Hold Notice Was Issued
Jason Bigler	8/3/2020	10/4/2019	10/4/2019
Jay VanDerzee	5/10/2023*	3/3/2022	3/3/2022
Lior Shenkar	6/2/2023*	3/3/2022	3/3/2022
Omid Kordestani	1/14/2021	2/4/2020	2/4/2020
Sridhar Ramaswamy	1/14/2021	11/4/2019	11/4/2019
Noam Wolf	1/15/2021	10/4/2019	10/4/2019
Nitish Korula	2/16/2021	10/4/2019	10/4/2019
Mike Schulman	2/16/2021	10/4/2019	10/4/2019
Adam Stewart	5/5/2023*	3/8/2021	3/8/2021
Joerg Heilig	5/10/2023*	1/29/2021	1/29/2021
Chip Hall	5/18/2023*	1/22/2021	1/30/2020
Dave Rolefson	4/11/2023*	1/22/2021	1/22/2021
Jayavel Shanmugasundaram	4/11/2023*	1/22/2021	7/14/2020
Martin Pal	5/18/2023*	1/22/2021	6/23/2020
Rahul Srinivasan	5/10/2023*	1/22/2021	10/4/2019
Max Lin	5/18/2023*	1/22/2021	6/23/2020
Richard Gingras	4/11/2023*	1/22/2021	6/23/2020
Scott Silver	5/10/2023*	1/22/2021	6/23/2020
Shane Peros	5/10/2023*	1/22/2021	10/4/2019
Matthew Glotzbach	4/11/2023*	6/22/2020	6/2/2020
Daniel Alegre	4/11/2023*	6/2/2020	6/2/2020